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Attorneys for Respondents WHITE MOTOR SALES d/b/a FAIRFIELD TOYOTA and FAIRFIELD IMPORTS d/b/a FAIRFIELD TOYOTA

UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

WHITE MOTOR SALES d/b/a FAIRFIELD TOYOTA,) CASE 20-CA-35310
FAIRFIELD IMPORTS d/b/a FAIRFIELD TOYOTA,	WHITE MOTOR SALES d/b/a FAIRFIELD TOYOTA AND FAIRFIELD IMPORTS d/b/a FAIRFIELD TOYOTA'S RESPONSE TO ORDER TO SHOW
Employer,	CAUSE AND MOTION FOR SUMMARY JUDGMENT
and)	JUDGMENT
AUTOMOTIVE MACHINISTS LODGE NO. 1173,	
Union.)	
/	

The Employer, WHITE MOTOR SALES d/b/a FAIRFIELD TOYOTA and FAIRFIELD IMPORTS d/b/a FAIRFIELD TOYOTA does not oppose the Acting General

Counsel's Motion to Transfer Case to and Continue Proceedings Before the Board and for Summary Judgment filed in the above-entitled matter.

DATED: April 1, 2011

Respectfully submitted,

JORDAN LAW GROUP PATRICK W. JORDAN

By:

PATRICK W. JORDAM

Attorneys for Respondent WhITE MOTOR SALES d/b/a FAIRFIELD TOYOTA and FAIRFIELD IMPORTS d/b/a FAIRFIELD TOYOTA

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF MARIN

I am employed in the County of Marin, State of California. I am over the age of 18 and not a party to the within action; my business address is: 1010 "B" Street, San Rafael, California 94901.

On April 1, 2011, I served the document(s) described as WHITE MOTOR SALES d/b/a FAIRFIELD TOYOTA AND FAIRFIELD IMPORTS d/b/a FAIRFIELD TOYOTA'S RESPONSE TO ORDER TO SHOW CAUSE AND MOTION FOR SUMMARY JUDGMENT in this action by placing the true copies thereof enclosed in sealed envelopes addressed as follows:

Original Electronically Filed:

Lester A. Heltzer, Executive Secretary National Labor Relations Board 1099 - 14th Street, N. W. Washington, D.C. 20570-0001

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- [] (BY MAIL) I am "readily familiar" with the firm's practice for collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Rafael, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- [] (BY FAX) Pursuant to Rules 2001 et seq., I transmitted the above-described document by facsimile machine (which complied with Rule 2003(3)), to the above-listed fax number(s). The transmission originated from facsimile phone number (415) 459-9871 and was reported as complete and without error. The facsimile machine properly issued a transmission report, a copy of which is attached hereto.

- [X] (BY EMAIL) Pursuant to FRCP Rule 5(b), and agreement of counsel, I transmitted the above-described document by electronic transmission (email) (which complied with Rule 5(b), to the above-listed electronic address(s). The transmission originated from kk@pjordanlaw.com and was reported as complete and without error. A paper copy of the document(s) have also been served by mail as indicated above.
- [] (BY PERSONAL SERVICE) I caused to be delivered such envelope by hand to the offices of the addressee.
- [] (BY OVERNIGHT DELIVERY) I caused said envelope(s) to be delivered overnight via an overnight delivery service in lieu of delivery by mail to the addressee(s).

Executed on April 1, 2011, at San Rafael, California. I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Karen E. Kempler